

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 LAJOI ZEQUELINE GOFF, and
D-2 MALIK DEQUAN HODO,

Defendants.

Case:4:22-cr-20491
Judge: Kumar, Shalina D.
MJ: Ivy, Curtis
Filed: 09-21-2022 At 12:07 PM
INDI USA v GOFF, et al (sk)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
Possession of a Machinegun
(18 U.S.C. § 922(o)(1))

D-1 LAJOI ZEQUELINE GOFF

On or about August 3, 2022, in the Eastern District of Michigan, Lajoi Goff knowingly possessed a machinegun, that is, a Glock Model 17, 9mm caliber, handgun containing an auto sear, or Glock switch, in violation of Title 18, United States Code, Sections 922(o)(1) and 924(a)(2).

COUNT TWO
Possession of a Machinegun
(18 U.S.C. § 922(o)(1))

D-2 MALIK DEQUAN HODO

On or about August 3, 2022, in the Eastern District of Michigan, Malik Hodo knowingly possessed a machinegun, that is, a Glock Model 17, 9mm caliber, handgun containing an auto sear, or Glock switch, in violation of Title 18, United States Code, Sections 922(o)(1) and 924(a)(2).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby gives notice to the defendant of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; all

property involved in, or property traceable to, the violations alleged in this

Indictment.

THIS IS A TRUE BILL.

Dated: September 21, 2022

s/GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/TIMOTHY M. TURKELSON
TIMOTHY M. TURKELSON (P53748)
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s/ANTHONY P. VANCE
ANTHONY P. VANCE (P61148)
Assistant United States Attorney
Chief, Branch Offices

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Companion Case information MUST be completed by AUUnited States District Court
Eastern District of Michigan**Criminal Case Cov**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: TT

Case Title: USA v. LAJOI GOFF & MALIK DEQUAN HODOCounty where offense occurred : GeneseeCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/___ Information --- no prior complaint.
☐ Indictment/___ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 21, 2022

Date

s/TIMOTHY TURKELSON

Timothy Turkelson
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600 Church Street
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Email: Timothy.Turkelson@usdoj.gov
P53748

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.